

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

**UNITED STATES OF AMERICA and
COMMONWEALTH OF
MASSACHUSETTS *ex rel.* JULIO
ESCOBAR and CARMEN CORREA**

Relators–Plaintiffs,

v.

**UNIVERSAL HEALTH SERVICES, INC.,
UHS OF DELAWARE, INC., and HRI
CLINICS, INC.**

Defendants.

C.A. No. 11-CV-11170-DPW

JOINT STATUS REPORT

In response to the Court’s July 1, 2020 Order (ECF No. 311) that the Parties submit a joint status report by July 10, 2020 concerning the status of settlement negotiations, the Commonwealth of Massachusetts (the “Commonwealth”) and Relators Julio Escobar and Carmen Correa (collectively, the “Relators”), together with Defendants Universal Health Services (“Universal”), UHS of Delaware, Inc. (“UHS-DE”), and HRI Clinics, Inc. (“HRI”) d/b/a Arbour Counseling Services (“Arbour”) (collectively, “Defendants”) jointly file this status report.

Since the last status report, the Parties have fully executed a final settlement agreement and other related papers. The settlement agreement resolves the above-captioned case (“*Escobar*”), as well as the associated cases, *United States et al. ex rel. Correa et al. v. Universal Health Services, Inc. et al.*, 17-cv-11843-DPW (“*Correa*”), and *HRI Clinics, Inc. v. Sudders, et al.*, 18-cv-11890-DPW (“*Sudders*”).

Moreover, the Relators and Defendants report that they have reached an agreement in principle concerning the payment of attorneys' fees, costs and expenses pursuant to 31 U.S.C. § 3730(d)(1) and (d)(2), which, if finalized, would obviate the need to bring that issue before the Court. (A claim for attorneys' fees and costs by Relators' previous counsel has also been finalized.) Separately, Relators' predecessor counsel has filed an attorney's lien. An attorney representing predecessor counsel and Relators' current counsel have commenced discussions to see if this matter can be resolved without the Court's assistance. Relators' current counsel will keep the Court apprised of the progress of these discussions.

In any event, the Parties anticipate filing Joint Stipulations of Dismissal in the next 10 days, which would either seek to dismiss the entirety of all three above-referenced cases, or dismiss these cases but retain for the Court the question of Relators' claim to reasonable attorneys' fees, costs, and expenses.

Given the foregoing update, the Parties request that the current stay remain for the next 10 days so that stipulations of dismissal can be filed with the Court.

Respectfully submitted,

COMMONWEALTH OF
MASSACHUSETTS

By its attorney,

MAURA HEALEY
Attorney General

Dated: July 10, 2020

/s/ Philip Schreiber
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UNIVERSAL HEALTH SERVICES, INC.,
UHS OF DELAWARE, INC., AND HRI
CLINICS, INC.

By their attorneys,

Dated: July 10, 2020

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JULIO ESCOBAR &
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By their attorneys,

Dated: July 10, 2020

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CERTIFICATE OF SERVICE

I certify that, on July 10, 2020, this document (filed through the ECF system) will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Philip Schreiber
Philip Schreiber